

213-633-5895 ARCHON-GROUP

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Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Los Angeles Region

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Gray Davis
Governor

December 16, 1999

WHC-Six Real Estate Limited Partnership
c/o Ms. Vera Ingram
Archon Group
600 East Las Colinas Boulevard, Suite #400
Irving, TX 75039

Post-it Fax Note	7671	Date	12/15/99	Page	2
To	Brad Burton	From	Rebecca Chen		
Co/Dept		Co.	RA/B/C/S		
Phone #		Phone #			
Fax #		Fax #			

SLIC PROGRAM - SOIL CLOSURE AND GROUNDWATER MONITORING
LOS NIETOS BUSINESS CENTER
9120-9160 SOUTH NORWALK BOULEVARD AND 11925-11933 EAST LOS NIETOS ROAD
SANTA FE SPRINGS, CA (SLIC CASE No. 883)

Dear Ms. Ingram:

We have reviewed your "Soil Investigation-Northern Excavation" report dated November 19, 1999, prepared by your consultant Clayton Environmental Consultants, Inc., requesting soil closure, along with the following site assessment reports submitted to this Regional Board for the above-referenced site.

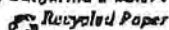
- "Toxic Hazard Assessment Conducted at the Armco, Inc. Facility" dated May 3, 1988.
- "Site Assessment Report" dated July 27, 1988.
- "Phase I Environmental Site Assessment" dated September 2, 1993.
- "Phase I Environmental Update" dated April 19, 1994.
- "Phase II Report of Subsurface Investigation" dated May 9, 1994.
- "Phase I Environmental Site Assessment Update" April 1996.
- "Addendum to Phase I Environmental Site Assessment Update Bank of America Asset No.BA-10100(Counter No.13)" dated July 2, 1996.
- "Phase I Environmental Assessment Update" dated June 16, 1999.
- "Briefing Document" dated August 12, 1999.
- "Additional Monitoring Well Installation Groundwater Sampling, and File Review" dated September 29, 1999.

The subject site is approximately 12 acres and is currently developed and used as an office/industrial park for commercial and light industrial activities. Numerous potential point sources were identified on-site from features associated with various operations in the past: above-ground tanks, underground tanks, industrial waste clarifiers, sumps, pits, machining areas, french drains, metal grinding areas, dry wells, storage areas, and stained areas.

Over the years approximately 10,000 cubic yards of contaminated soils were excavated from the site to a cleanup criteria of 100 part per million for total petroleum hydrocarbons, and 10 times the California Code of Regulations (CCRs), Title 22. Soluble Threshold Limit Concentration (STLC) for metals. However, confirmation soil samples were not analyzed for volatile organic compounds (VOCs) at the northern excavation area, where VOCs were previously identified. Subsequently, the Regional Board

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required confirmation samples at the northern excavation area. Your "Soil Investigation-Northern Excavation" report dated November 19, 1999, transmits information on the soil matrix confirmation sampling activities to verify cleanup of the VOCs in the northern area. The confirmation soil matrix samples collected in the northern area demonstrate that the VOC soil contamination has been remediated.

The site appears to be adequately characterized and possible pathways to receptors identified. Based on information submitted to date, we concur with your consultant's conclusion that soil closure is appropriate. We have determined that the VOC, petroleum hydrocarbon, and heavy metal contaminated soils have been remediated to levels satisfactory to this Regional Board's soil criteria. The soil criteria based on our Interim Site Assessment and Cleanup Guidebook, U.S. EPA Region IX Preliminary Remedial Goals, and CCRs, Title 22, hazardous materials classification. Therefore, no further action is required regarding assessment and/or remediation of the underlying soil at the subject site.

Regarding the VOCs and heavy metals impacted groundwater, we have determined that three additional quarters of groundwater data must be provided to determine the groundwater plume trend. Based on the groundwater data to be provided, a determination will be made regarding site closure and/or additional groundwater assessment.

In addition, a former water well was previously operated on-site north of the facility. No information was provided regarding the current status of the well. Also, no boring logs or as-built diagrams were provided for groundwater monitoring wells MW-1, MW-2, MW-3, MW-4, and MW-5. Please provide information regarding the disposition of the water well, and borings logs and as-built diagrams for the groundwater monitoring wells to this Regional Board by January 28, 2000.

If you have any questions regarding this matter, please contact Mr. Jimmie Woo at (213) 576-6705 or jwoo@rb4.swrcb.ca.gov.

Sincerely,

Dennis A. Dickerson
Executive Officer



Dennis Dasker
Chief, Groundwater Protection Division

cc. Mr. Troy Jenkins, Archon Group
Mr. Richard D. Fehler, Clayton Group

California Environmental Protection Agency

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